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April 20, 2023

Chair Dan Garodnick
City Planning Commission
120 Broadway
New York, NY 10271

Re: City of Yes for Carbon Neutrality

Dear Chair Garodnick,

On behalf of Regional Plan Association, I am pleased to share our strong support for Mayor Eric Adams’ proposed city text amendment, City of Yes for Carbon Neutrality (COYCN). Given the threat that climate change and sea level rise pose to our city, there is no time to wait. It is crucial that the administration – and the city as a whole – step up efforts to reduce or eliminate carbon emissions from buildings and vehicles.

In RPA’s [Fourth Regional Plan](#), rising to the challenge of climate change was one of our core action areas to realize a more sustainable region. We highlighted the importance of a multi-pronged approach to meet the goal of 80% GHG emissions reduction. We are beginning to see a scaling up of critical efforts, such as renewable energy and building electrification.

However, the details matter and getting them right is necessary to meet our climate goals. We need to make it easier to implement measures to modernize a renewable energy grid, reduce costs to create energy efficient buildings, adapt parking infrastructure to support electric vehicles, and utilize our streets better to reduce stormwater flow.

That is why we support City Planning’s COYCN zoning proposal, and hope the public review process doesn’t diminish its impact. I want to highlight a few key aspects that are especially important to RPA:

Elevated Solar Trellises

COYCN would allow elevated solar trellises over 100% of roof area, an important change which we support to make the most of our ample rooftop opportunities.

Allowing elevated solar trellises over 100% of roof coverage could increase potential solar energy generation by 290%. As electric buildings and electric cars increase the demands on the grid, it is more important than ever to generate clean power locally while reducing GHGs and improving the health of communities who have disproportionately borne the burden of polluting power plants. We are also convinced this rule change would have little, if any, impact on how pedestrians experience our city at street level.

Green Retrofits

We have been advocating for funding and improving conditions at NYCHA developments across the City. We strongly support COYCN in allowing buildings to be retrofitted with exterior, insulating panels, to help preserve and improve our affordable and public housing.

Nearly 70% of carbon emissions come from buildings, making them the largest contributor to climate change in NYC. When it comes to older affordable and public housing stock, improving building insulation is a key task. Adding insulation inside a building often reduces the size of apartments and also leaves many gaps in the façade for heat to leak out. Putting exterior cladding on buildings improves their insulation, but arcane zoning definitions, like what is exactly considered "floor area," often stymie these efforts. This needs to be changed to preserve our city's affordable and public housing stock. We recognize there is a tremendous cost associated with this, but city, state and federal funding support will help and we encourage the city to continue to push for more funding.

Heat Pumps on Roofs and in Yards

COYCN would expand the ability of building owners to place HVAC equipment, like heat pumps, on roofs and in yards – this is vital for reducing our carbon footprint.

"Permitted obstructions" are one of the most obscure parts of the Zoning Resolution, but what is and isn't allowed on roofs and in yards is a huge problem. To take buildings off gas or fuel oil and convert them to heat pumps or other green HVAC systems often require significant equipment on roofs and in yards. Current zoning often allows only very tight allowance for that equipment, meaning that it may be impossible for a building owner to actually convert to heat pumps.

Electric Vehicle Charging

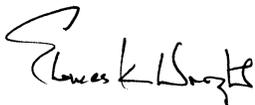
COYCN would more than double the commercially-zoned land where EV charging facilities can locate. It would also clarify regulations and facilitate safe bicycle and e-mobility parking.

By 2035, all vehicles sold in New York State must be electric, which will greatly increase demand for charging stations. But today, electric vehicle charging facilities are not allowed in many commercial districts closest to where people live. This proposal would permit EV charging in those districts and is essential to meet this growing electric fleet.

Given that climate change is an existential threat to our city, we hope that the Community Boards, Borough Boards, Board Presidents, Planning Commission, and City Council vote to approve this zoning text amendment and not weaken its provisions.

With COYCN, our City will have more options for pursuing our climate goals across the City - adapting outdated regulations for a modern era. Thank you for your consideration of our support and please let me know if you need any additional information from us.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas K. Wright". The signature is stylized with a large, sweeping initial 'T'.

Thomas K. Wright
President & CEO